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6 UNITED STATES DISTRICT COURT

7 DISTRICT OF NEVADA

8 TRINA BURRAGE-SIMON,)
9 Plaintiffs,) CASE NO.: 2:14-cv-00429-GMN-NJK
vs.)
10 STATE FARM MUTUAL AUTOMOBILE)
11 INSURANCE COMPANY; DOES I-X, and)
12 ROE CORPORATIONS I-X, inclusive,)
13 Defendants.)

14 **PLAINTIFF'S UNOPPOSED REQUEST FOR EXTENSION OF TIME TO FILE**

15 **PLAINTIFF'S OPPOSITION TO THE MOTION FOR SUMMARY JUDGMENT**

16 **(First Request)**

17 COMES NOW, Plaintiff, by and through their attorney, Leslie Mark Stovall, Esq.,
18 requesting an extension of time to answer the Defendant's Motion for summary Judgment.

19 DATED this 9th day of April, 2015.

20 STOVALL & ASSOCIATES

21 */s/ Christopher A. Elsee, Esq.*

22 By:

22 LESLIE MARK STOVALL, ESQ.
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24 2301 Palomino Lane
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25 Ph: (702) 258-3034
Attorneys for Plaintiff
26
27
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STATEMENT OF FACTS

Plaintiff's counsel has requested an extension of time to file his opposition to Defendant's Motion for Summary Judgment because on April 9, 2014 he has a deposition scheduled for all morning, and then has a doctor's appointment he must attend in the afternoon.

Plaintiff's counsel requested a one-week extension from Defendant's counsel, who granted that request. *See* Exhibit 1, email exchange between Plaintiff's and Defendant's counsel.

This is the first such request from Plaintiff's counsel.

DATED this 9th day of April, 2015.

STOVALL & ASSOCIATES

/s/ Christopher A. Elsee, Esq.

By:

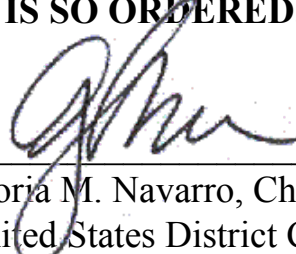
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Attorneys for Plaintiff

ORDER

IT IS SO ORDERED:

The UNITED STATES DISTRICT COURT JUDGE / MAGISTRATE JUDGE hereby grants Plaintiff's First Request for an extension to file an Opposition to Defendant's Motion for Summary Judgment. The opposition shall be due April 16, 2015.

IT IS SO ORDERED.



Gloria M. Navarro, Chief Judge
United States District Court

DATED: 04/14/2015

CERTIFICATE OF SERVICE

Pursuant to Rule 5(b) of the Nevada Rules of Civil Procedures, I certify that on the 9th day of April, 2015, I served a true and correct copy of the above and foregoing **PLAINTIFF'S UNOPPOSED FIRST REQUEST FOR EXTENSION OF TIME TO FILE PLAINTIFF'S OPPOSITION TO THE MOTION FOR SUMMARY JUDGMENT** on the parties addressed as shown below:

☒ Via U.S. Mail by placing said document in a sealed envelope, with postage prepared (N.R.C.P. 5(b))

☐ Via Electronic Filing (N.E.F.R. 9(b))

☐ Via Electronic Service (N.E.F.R. 9)

☒ Via Facsimile (E.D.C.R. 7.26(a))

Brent D. Quist, Esq.
DENNETT WINSPEAR
3301 N. Buffalo Dr., Ste. 195
Las Vegas, NV 89129
Fax: (702) 839-1113
Attorneys for Defendants

/s/ Tracy Lucas

An employee of STOVALL & ASSOCIATES

Exhibit 1

Tracy Anne Lucas

From: Christopher A. Elsee
Sent: Thursday, April 09, 2015 10:41 AM
To: Tracy Anne Lucas
Subject: Fw: RE: Burrage-Simon v. State Farm - EXTENSION REQUEST

CAE
Sent from iPhone

Begin forwarded message:

From: Brent Quist <bquist@dennettwinspear.com>
Date: April 9, 2015 at 9:27:32 AM PDT
To: 'Christopher A. Elsee' <chris@lesstovall.com>
Cc: 'Debora Ponce' <dponce@dennettwinspear.com>
Subject: RE: Burrage-Simon v. State Farm - EXTENSION REQUEST

Chris,

The one week extension on the MSJ opposition is fine with me. Plaintiff's response will be due April 16, 2015.

I hope to forward the draft PreTrial Order to you soon.

Brent

From: Christopher A. Elsee [<mailto:chris@lesstovall.com>]
Sent: Wednesday, April 08, 2015 5:57 PM
To: Brent Quist
Subject: Burrage-Simon v. State Farm - EXTENSION REQUEST

Mr. Quist:

4/9/2015

Can you grant me a one-week extension to answer the MSJ in this thing? The reason I ask is because I'm getting thrown into a depo tomorrow that might take the majority of the day, and then I have a doctor appointment late afternoon.

I don't even know that I'll need one week, but if you could grant that I'd greatly appreciate it. If you do, I'll file an unopposed motion to extend time. I'm hoping I'll get the thing filed anyway, but just in case . . .

Thanks,

Christopher A. Elsee, Esq.

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